

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	
	:	
Kim Tharesa Holt	:	Case No.: 19-12819ELF
	:	
	:	
Debtor	:	Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Kim Tharesa Holt, by and through her undersigned counsel, hereby move to modify her Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about May 1, 2019.
2. The Chapter 13 filing was assigned case number 19-12819ELF.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about November 12, 2019.
4. On or about March 24, 2020 the Debtor and the mortgagee, Deutsche Bank National Trustee Company, et al, entered into a Stipulation resolving the pending Motion for Relief.
5. Per the Stipulation, the Debtor is delinquent in the sum of \$7,500.11 in post-petition mortgage payments. A true and correct copy of the Stipulation is attached hereto as **Exhibit "A."**
6. In accordance with the Stipulation, the Debtor will cure the subject \$7,500.11 by amending the Chapter 13 plan within seven (7) days of the entry of the Stipulation.

7. In furtherance of the Stipulation and the Debtor curing the post-petition delinquency, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

8. The Debtor's proposed modified Chapter 13 Plan is attached hereto as "**Exhibit B**", and is affordable to the Debtor.

WHEREFORE, the Debtor requests that she be permitted to modify her Chapter 13 Plan for the above-stated reasons.

Dated: March 25, 2020

/s/Brad J. Sadek, Esq
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